## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Tobias B. Schoenwandt and A. Christine

Giordano aka A, Christine Schoenwandt

Debtors.

JPMorgan Chase Bank, National Association

v.

Tobias B. Schoenwandt and A. Christine Giordano aka A, Christine Schoenwandt

Debtors.

William C. Miller, Trustee,

Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER

12-13474/MDC

11 U.S.C. § 362

June 8, 2017 at 11:00am

Courtroom # 2

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

JPMorgan Chase Bank, National Association has filed a Motion for Relief, with the Court for relief from the automatic stay.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before May 27, 2017 you or your attorney must do all of the following:
  - (a) file an Answer explaining your position at United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107. If you mail your Answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and
    - (b) mail a copy to Movant's attorney:

Kevin S. Frankel, Esquire

Shapiro & DeNardo, LLC

3600 Horizon Drive, Suite 150, King of Prussia, PA 19406

Phone: (610)278-6800 Fax: (847) 954-4809

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the HONORABLE MAGDELINE D. COLEMAN on June 8, 2017 at 11:00am in Courtroom #2, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an Answer.

Respectfully submitted,

Dated: May 10, 2017 BY: /s/ Kevin S. Frankel

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